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14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN JOSE DIVISION

19
20 UNITED STATES OF AMERICA,) CASE NO. 15-CR-00226-BLF
21 Plaintiff,)
22 v.) JOINT STIPULATION FOR EXCLUSION OF
23 DOUGLAS STORMS YORK,) TIME FROM JULY 14, 2015, TO JULY 21, 2015,
24 Defendant.) [PROPOSED] ORDER TO EXCLUDE TIME FROM
25) JULY 14, 2015, TO JULY 21, 2015

19
20 JOINT STIPULATION

21 On July 14, 2015, the parties appeared before the Honorable Beth L. Freeman for a status
22 conference on the superseding indictment in this matter. At the hearing, defense counsel informed the
23 Court that additional time is needed to evaluate issues relating to the defendant's case, specifically
24 regarding the superseding count. Therefore, the matter was continued until July 21, 2015 at 9:00 a.m. for
25 further status conference.

26 The parties hereby stipulate that the time between July 14, 2015, and July 21, 2015, at 9:00 a.m.,
27 should be excluded from the calculation of time within which the trial in this case must commence
28 pursuant to the Speedy Trial Act, in order to allow each counsel sufficient time to effectively prepare,

JOINT STIPULATION FOR EXCLUSION OF TIME AND [PROPOSED] ORDER TO EXCLUDE TIME
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1 taking into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of
2 justice served by granting the request outweigh the best interest of the public and the defendant in a
3 speedy trial.

4 DATED: July 15, 2015

Respectfully submitted,

5 MELINDA HAAG
6 United States Attorney

7 /s/_____
8 BRIANNA L. PENNA
9 Special Assistant United States Attorney

10 DATED: July 15, 2015

11 /s/_____
12 GRAHAM ARCHER
13 Attorney for the Defendant

[PROPOSED] ORDER

14 Pursuant to the parties' motion, the Court HEREBY ORDERS that the time between July 14,
15 2015, and July 21, 2015 be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. The Court finds,
16 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), that the failure to grant the requested continuance
17 would deny counsel the reasonable time necessary for effective preparation, taking into account the
18 exercise of due diligence.

19 Furthermore, the Court finds that the ends of justice served by granting the requested
20 continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court
21 therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and
22 (B)(iv).

23 IT IS SO ORDERED.

24
25
26 DATED:_____

27 HON. BETH L. FREEMAN
28 United States District Judge